

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

Otto A. Baum

NIKKI BOLLINGER GRAE, Individually and) Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)
Plaintiff,) Honorable Aleta A. Trauger
vs.) Magistrate Judge Jeffrey S. Frensley
CORRECTIONS CORPORATION OF)
AMERICA, et al.,)
Defendants.)

**DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL CERTAIN
CONFIDENTIAL DOCUMENTS IN CONNECTION WITH THEIR MOTION TO
EXCLUDE TESTIMONY OF DONNA MELLENDICK**

Pursuant to Rules 5.03 and 7.01 of the Civil Local Rules of Court and the Stipulation and Order Amending Protective Order to Protect Source Selection Information (the “SSI Protective Order”) (Dkt. No. 177), Defendants respectfully request the Court to grant Defendants leave to file wholly or partially under seal Exhibits 1, 3 and 4 to the Declaration of Eric C. Pettis filed in support of Defendants’ Motion To Exclude Testimony of Donna Mellendick (“Pettis Decl.”).

First, Defendants seek leave to file with limited redactions Exhibits 1 and 3 to the Pettis Decl.:

- Exhibit 1 to the Pettis Decl. is a true and correct copy of the August 7, 2020 Expert Report of Donna Mellendick. The Report describes information contained in documents, including documents Bates numbered BOP_0293137, BOP_0020124, BOP_0334043, and a number of Contract Performance Assessment Reports (“CPARs”).